

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. GRACE & CO., <i>et al.</i> ,)	Case No. 01-01139 (JFK)
)	Jointly Administered
Debtors)	
)	Re: Docket No. 15078

**CERTIFICATION OF NO OBJECTIONS RE
AMENDED CASE MANAGEMENT ORDER FOR THE
ESTIMATION OF ASBESTOS PERSONAL INJURY LIABILITIES**

1. As a result of various discussions among the parties and directions from the Court, the parties to the Asbestos Personal Injury Estimation Proceeding have negotiated the form a new Case Management Order to govern these proceedings.
2. Attached hereto as Exhibit A is the form of a new Case Management Order (the "New CMO") to which the parties have agreed.
3. The parties have not reached agreement on all matters addressed in the New CMO. Specifically, the parties are not in agreement with respect to the appropriate deadline for completion of all non-expert discovery or the timing on the filing or hearing on *Daubert* motions. Further, the New CMO lists as "TBD" dates with respect to the estimation trial, pending the Court's review of its schedule. As a result, those matters are listed as "TBD" in the New CMO. However, as some dates in the previous cmo have already passed, it is vital to have a new cmo entered pending a hearing on the remaining outstanding issues.


4. As a result, the parties request: (i) immediate entry of the attached New CMO; and (ii) that the outstanding issues remaining regarding the New CMO be heard by the Court on June 21, 2007 as outlined in the New CMO.

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